

# **EXHIBIT D**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

MADELINE FELDMAN		
	Plaintiff,	
-against-		Civ. No.: 23-cv-6169-LGS
MIND MEDICINE, INC.,		
	Defendant.	

-----X

**DECLARATION OF MARK R. SULLIVAN IN SUPPORT OF DEFENDANT’S MOTION  
TO TRANSFER VENUE TO THE WESTERN DISTRICT OF TEXAS PURSUANT TO  
28 U.S.C. § 1404(a)**

I, Mark R. Sullivan, declare as follows:

1. I have personal knowledge of the facts addressed in this declaration, and if called I am competent to testify as to these matters.
2. I submit this declaration in support of Defendant Mind Medicine, Inc.’s (“MindMed”) motion to transfer venue to the Western District of Texas, pursuant to 28 U.S.C. § 1404(a).
3. Since April 2023, I have worked for Mind Medicine, Inc., a clinical stage biopharmaceutical company developing novel product candidates to treat brain health disorders.
4. MindMed is a wholly-owned subsidiary of “Mind Medicine (MindMed) Inc.,” a corporation organized under the laws of British Columbia. MindMed is incorporated in the State of Delaware, and maintains its principal executive office in New York, New York.
5. The principal executive office in New York is not an operational office – it is used for SEC registration purposes as a mailing address, and may be used by an executive from time to time which happens infrequently. There are no employees regularly located at the New York

office nor is work controlled or directed through the New York office (or any one specific office or location).

6. Given MindMed's global reach, employees work remotely and may report to individuals who reside outside of their state of residence.

7. According to MindMed's records, Plaintiff resided in Reno, Nevada (April 2020 to July 2021) and Austin, Texas (July 2021 to December 2022) during her employment with MindMed.

8. Plaintiff resided in Nevada or Texas at all times during her employment, and MindMed never requested she relocate from these states to New York or to any other state.

9. Plaintiff was the Director of Operations & Administration, and was responsible for generalist tasks, such as coordinating conferences, repaying vendor invoices, scheduling travel, and providing business management.

10. From April 15, 2020 to February 18, 2021, Plaintiff reported to the then Executive Chair and Co-CEO, Stephen Hurst. Mr. Hurst resided in Nevada at the time he supervised Plaintiff.

11. From February 18, 2021 to December 17, 2021, Plaintiff reported to the then Chief Technology Officer, Bradford Cross. Mr. Cross resided in California at the time he supervised Plaintiff.

12. From December 17, 2021 to December 2, 2022, Plaintiff reported to the Vice President of Global Operations, Jakub Klimes. Mr. Klimes resided in the nation of Slovakia at the time he supervised Plaintiff.

13. Robert Barrow, Chief Executive Officer of MindMed, resides in Wisconsin, and did so during Plaintiff's employment at MindMed.

14. Carol Nast, the former Chief Operating Officer of MindMed, resided in California during Plaintiff's employment at MindMed.


15. Jamon Rahn, Co-Founder and former Chief Executive Officer of MindMed, resided in Florida during Plaintiff's employment at MindMed.

16. Dan Karlin, Chief Medical Officer of MindMed, resides in New York and did so during Plaintiff's employment at MindMed.

17. Plaintiff initially raised her claims in a demand letter sent by a Texas attorney alleging claims under Federal and Texas laws.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of September 2023 in Moorestown, New Jersey

By:   
Mark R. Sullivan